

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

OMAR HERNANDEZ and HANNAH
GOLDEN, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

ILLINOIS INSTITUTE OF TECHNOLOGY,

Defendant.

Case No.: 1:20-cv-3010

PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL

PLEASE TAKE NOTICE that Plaintiffs Omar Hernandez and Hannah Golden (“Plaintiffs”), by and through their counsel, respectfully move for an Order under Federal Rule of Civil Procedure 23:

(1) Preliminarily approving the proposed Settlement on behalf of the Settlement Class according to the terms of the Agreement;

(2) Provisionally certifying, for purposes of settlement only, the Settlement Class defined as:

All students who paid or were obligated to pay tuition, fees, or other costs to Illinois Tech for the Spring 2020 academic term.

(3) Preliminarily appointing Plaintiffs as Class Representatives;

(4) Preliminarily appointing Paul J. Doolittle, Roy T. Willey IV, and Eric M.

Poulin of Poulin | Willey | Anastopoulo and Daniel J. Kurowski of Hagens

Berman Sobol Shapiro LLP as Class Counsel to act on behalf of the Settlement

Class and Class Representative with respect to the Settlement;

- (5) Approving the Parties' proposed notice procedure, including approving the Parties' selection of Simpluris, Inc. as Settlement Claims Administrator, and approving the Parties' proposed schedule;
- (6) Entering the proposed Preliminary Approval Order, which was submitted concurrently herewith; and
- (7) Granting such other and further relief as may be just and appropriate.

This Motion is based upon this notice, the Declarations of Paul J. Doolittle and Daniel J. Kurowski and the accompanying exhibits, the concurrently filed memorandum of points and authorities, and upon all prior proceedings, pleadings, and filings in the above-captioned action.

Dated: August 21, 2025

Respectfully submitted,

By: /s/ Paul J. Doolittle

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